

ZIAD ASGHAR Conf. AEO - 30b6
ARM, LTD. V. QUALCOMM INC.

November 08, 2023

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1 Qualcomm side in negotiating this ALA with Arm?

2 A I don't know.

3 Q Were you involved in any Qualcomm internal
4 discussions when this ALA was being negotiated?

5 A No.

6 Q To your knowledge, is this ALA still in
7 effect today?

8 A Yes.

9 Q If you look at the first page [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED] "

20 Do you see that?

21 [REDACTED] Yes, I see that.

22 [REDACTED] To your knowledge, there was a prior ALA
23 between Qualcomm and Arm from September of 2003?

24 A I am not aware.

25 Q You weren't involved in negotiating that

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1 prior ALA?

2 A No, I joined Qualcomm in 2010.

3 Q Fair enough. Focusing on this ALA,
4 Exhibit 4, what rights did Qualcomm obtain under
5 this ALA to your knowledge?

6 MR. BRALY: Objection.

7 BY MR. MUINO:

8 Q You can go ahead and answer.

9 A From my product perspective, [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MR. BRALY: Objection; calls for a legal
16 conclusion.

17 BY MR. MUINO:

18 Q Would you characterize it that way?

19 A [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED]

7 Q Now, Arm offers its own design cores, it
8 licenses its own design cores to licensees; is that
9 correct?

10 A That's right.

11 Q And under an ALA it grants the licensee
12 the right to develop their own custom CPU, but one
13 that is compliant with the Arm architecture; is that
14 correct?

15 A [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 Q Okay. So I think we'll be talking about
20 this quite a lot today. I want to make sure we're
21 clear on the terms.

22 A Sure.

23 Q So there's the Arm design cores and then
24 there's the custom cores that a licensee could
25 develop under the Arm ALA; is that fair?

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1 A Yes.

2 Q And so if I refer to a custom core, will
3 you understand what I'm referring to, or do you have
4 another term that you prefer to use?

5 A You can call it Qualcomm ALA core, yeah,
6 that's fine. Just so it is clear.

7 Q Or a differentiated core?

8 A Custom core is fine. let's go with that.

9 Q [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED].

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1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]

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1 [REDACTED]
2 core --
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1	[REDACTED]
2	[REDACTED]
3	[REDACTED]
4	[REDACTED]
5	[REDACTED]
6	[REDACTED]
7	[REDACTED]
8	[REDACTED]
9	[REDACTED]
10	[REDACTED]
11	[REDACTED]
12	[REDACTED]
13	[REDACTED]
14	[REDACTED]
15	[REDACTED]
16	[REDACTED]
17	[REDACTED]
18	[REDACTED]
19	[REDACTED]
20	[REDACTED]
21	[REDACTED]
22	[REDACTED]
23	[REDACTED]
24	[REDACTED]
25	[REDACTED]

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A horizontal bar chart with 25 data points. The y-axis is labeled with numbers 1 through 25. The x-axis is divided into four categories by vertical lines. Category 1 (leftmost) has 1 bar. Category 2 has 2 bars. Category 3 has 3 bars. Category 4 (rightmost) has 21 bars. All bars are black.

Category	Count
1	1
2	2
3	3
4	21

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1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED].
12 Q [REDACTED]
13 stopped?
14 A [REDACTED] [REDACTED]
15 public.
16 Q [REDACTED]
17 A [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 [REDACTED]

2 [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED] [REDACTED] a

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]			
3	[REDACTED]	[REDACTED]	[REDACTED]	
4	[REDACTED]			
5	[REDACTED]			
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]			
8	[REDACTED]			
9	[REDACTED]			
10	[REDACTED]			
11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]	
13	[REDACTED]			
14	[REDACTED]	[REDACTED]	[REDACTED]	
15	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]			
17	[REDACTED]	[REDACTED]		
18	[REDACTED]			
19	[REDACTED]	M	[REDACTED]	[REDACTED]
20	[REDACTED]			
21	[REDACTED]			
22	[REDACTED]			
23	[REDACTED]	[REDACTED]		
24	[REDACTED]			
25	[REDACTED]	[REDACTED]		

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ARM, [REDACTED]

1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] f [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] have a family for [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] scores [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 [REDACTED] Version 9.

2 [REDACTED]

3 [REDACTED] c [REDACTED]

4 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 [REDACTED]

6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED] smartphone SOC have a name?

12 [REDACTED] d [REDACTED]

13 [REDACTED] d there are other [REDACTED] cores

14 [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED] [REDACTED]

19 A In a smartphone chip you want to have the
20 ability to go to high performance, but you also want
21 to have the ability to be able to operate a very low
22 part consumption. So when you're using the phone
23 actively, you go to the big core. When you use it,
24 for example, it's sitting in your pocket it's
25 typically using the smaller core. You need low

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1 performance, high performance, low power, high
2 power, and it also allows you to get to a better
3 area.

4 [REDACTED]

5 [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] SOC?

21 [REDACTED] [REDACTED] [REDACTED]

22 [REDACTED] you [REDACTED]

23 [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED]

25 [REDACTED]

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1 [REDACTED] [REDACTED]

2 [REDACTED]

3 Q Okay. So I planned to do this later in
4 the day, but since we got on this subject I'm going
5 to ask you more details about these cores. We still
6 have some time before we take a break. Let's start
7 back with the [REDACTED] core for the [REDACTED] SOC. Was
8 that the first [REDACTED] core that Qualcomm worked on?

9 A This was the first custom core that we
10 developed.

11 Q And when?

12 A In the [REDACTED] family, just to be clear.
13 All the other parts that I mentioned earlier that
14 were also custom cores in the past.

15 Q The [REDACTED] core was originally acquired
16 from Nuvia; is that right?

17 A What we acquired or what Nuvia was working
18 on was a server product. What we have in [REDACTED] is a
19 PC product. From my product perspective, servers
20 are very different products than PC, and their
21 requirements are vastly different. This is a custom
22 core for the PC market. Very different.

23 Q The [REDACTED] core that Qualcomm acquired
24 with Nuvia was for the server market?

25 A It was for the server market.

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1 Q And did that pertain to an SOC called
2 [REDACTED]

3 A That's correct.

4 Q That's [REDACTED] spelled with an [REDACTED]?

5 A That's right.

6 Q You didn't mention that in your list of
7 cores that Qualcomm worked on. Did Qualcomm
8 continue the development of the [REDACTED] core for the
9 [REDACTED] SOC after the acquisition of Nuvia?

10 A It was more the SOC work that continued
11 for some time, but that was discontinued.

12 Q When was that discontinued?

13 A I want to say around after March or April
14 of '22. I don't know the exact date, but somewhere
15 thereabouts.

16 Q In March or April of 2022, Qualcomm
17 discontinued --

18 A After that time, not in March/April, after
19 March or April of '22.

20 Q After March or April of 2022, Qualcomm
21 discontinued its work on the [REDACTED] SOC; is that
22 right?

23 A That's right.

24 Q The [REDACTED] SOC included a [REDACTED] core; is
25 that right?

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1 A For the server market, that's right.

2 Q Why did Qualcomm discontinue the [REDACTED]
3 SOC?

4 A I believe we had gotten some sort of
5 notice from Arm and we wanted to just make sure we
6 are abiding by all contracts. I was part of it.

7 Q So part of the reason for discontinuing
8 the [REDACTED] SOC was because of the positions that Arm
9 was taking?

10 A Yes, partly.

11 Q Were you involved in those conversations
12 with Arm?

13 MR. BRALY: Objection.

14 THE WITNESS: Not with Arm, but internally I
15 was in some discussions.

16 BY MR. MUINO:

17 Q What was your understanding of -- this is
18 the early 2022 time frame, what was your
19 understanding of what Arm was saying to Qualcomm
20 that caused Qualcomm to discontinue the [REDACTED] SOC?

21 A From a product perspective, Arm was
22 claiming that there were certain Arm technologies in
23 those products and there was a concern on our side.
24 We wanted to, of course, abide by all the rules [REDACTED]
25 [REDACTED] [REDACTED]

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2 [REDACTED] [REDACTED] [REDACTED], [REDACTED] would have to make
3 those changes, and it was canceled. A lot of work
4 was wasted.

5 Q Is there any current plan to bring the
6 [REDACTED] SOC back?

7 A I'm not aware of any such plan.

8 Q Does Qualcomm have any plan to use any
9 version of the [REDACTED] core for server SOCs?

10 A I'm not aware of any such plan.

11 Q The employees who were working on the
12 [REDACTED] SOC, were they redeployed to other purposes?

13 A It's more of an engineering question
14 really. I would think so.

15 Q Did Qualcomm have other reasons for
16 discontinuing the [REDACTED] SOC?

17 A Not anything that I can recall, but there
18 could have been other reasons.

19 Q All right. Let me ask you now about the
20 [REDACTED] core for the [REDACTED] SOC. When did Qualcomm
21 begin work on that?

22 A [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 Q So we are oriented in terms of time, the

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1 acquisition of Nuvia by Qualcomm occurred in March
2 of 2021; is that correct?

3 A I believe so.

4 Q [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED] [REDACTED]

7 [REDACTED] The employees, the engineers who were
8 working on [REDACTED] for [REDACTED], were they the former
9 Nuvia engineers?

10 A I'm not aware of the exact personnel, but
11 I'm assuming they were there and, of course,
12 Qualcomm had CPU capable people as well, so the
13 combined team.

14 Q And the [REDACTED] core for the [REDACTED] SOC was
15 based at the start on the [REDACTED] core that came in
16 from Nuvia; correct?

17 A It was a new core. Like I explained, that
18 the server market and PC markets are very different.
19 You have liquid cooling and a very different sort of
20 parameters in the server market compared to what you
21 have in a device like a PC. So these are different
22 cores.

23 Q My question really is the [REDACTED] core for
24 [REDACTED], it wasn't developed from scratch, right, it
25 started with the RTL from the [REDACTED] that came in

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1 with Nuvia?

2 A I don't believe so, but that should be a
3 question for engineering.

4 Q You're not sure about that?

5 A No, I don't think it came from there, but
6 it's a question, for engineering like I mentioned.

7 Q It isn't your understanding that [REDACTED]
8 for [REDACTED] is a completely new core, is it?

9 MR. BRALY: Objection.

10 THE WITNESS: It's a core that's a custom core
11 that's developed for a very different market, like I
12 was explaining. So from a PC perspective the
13 parameters are very different from what a server CPU
14 requires.

15 BY MR. MUINO:

16 Q I understand. What I understand is the
17 connection between the [REDACTED] core that Nuvia had
18 begun and started to develop and the [REDACTED] core
19 that was developed for [REDACTED] the [REDACTED] [REDACTED]
20 core, was derived in some way from the Nuvia [REDACTED]
21 core; correct?

22 MR. BRALY: Objection; asked and answered.

23 THE WITNESS: I'm not aware of that. That
24 should be an engineering question.

25 ///

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1 BY MR. MUINO:

2 Q It wasn't a coincidence they're both
3 called [REDACTED] right?

4 MR. BRALY: Objection.

5 THE WITNESS: You know, we change the names of
6 products on a daily basis. Names pretty much mean
7 nothing. Internal code names change all the time.

8 BY MR. MUINO:

9 Q The engineering -- so the Nuvia engineers
10 who joined Qualcomm after the acquisition in
11 March 2021, they went to work on [REDACTED] for [REDACTED]
12 correct?

13 A Like I said, the combined Qualcomm CPU
14 team which, of course, had a lot of capabilities
15 before, but definitely required this team because
16 they're a very good team and the combined team
17 worked on the custom core.

18 Q From a technical perspective, do you know
19 what differences there are between the [REDACTED] core
20 for [REDACTED] and the [REDACTED] core for [REDACTED]

21 MR. BRALY: Objection.

22 THE WITNESS: I don't.

23 BY MR. MUINO:

24 Q You're not in a position to have looked at
25 the RTL code?

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1 A No, I'm not an engineer, as you know.

2 Q Has Qualcomm finished developing the

3 [REDACTED] core for [REDACTED]

4 A Yes.

5 Q When did that development finish?

6 A I don't know the exact date, but, as you
7 know, publicly we launched our Snapdragon X Elite
8 product, which is the public name for [REDACTED]

9 Q The Snapdragon X Elite included [REDACTED] SOC?

10 A Like I said, the names mean nothing.

11 Internal name is [REDACTED] Snapdragon X Elite is the
12 public name for [REDACTED].

13 Q I appreciate that clarification. The
14 Snapdragon X Elite contains the [REDACTED] core;
15 correct?

16 A That's right.

17 Q Do you know how -- there's multiple
18 [REDACTED] cores inside of that product; is that
19 correct?

20 A There are multiple [REDACTED] cores, yes.

21 Q When was that product launched as it --
22 when did it become available first?

23 A Availability means a lot of things to
24 people, but we have our summit October 23rd, which
25 is publicly launched in Hawaii.

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1 Q That was October 23rd of this year?

2 A Yes, October 23rd or 24th is when it was
3 launched, yeah.

4 Q Just so that I make sure I've asked this
5 question, do you know in terms of the internal
6 development of the [REDACTED] SOC, do you know
7 approximately when that wrapped up?

8 MR. BRALY: Objection.

9 THE WITNESS: I don't honestly remember the
10 exact dates, but for you to be able to launch a
11 product it needs to have a certain degree of
12 readiness.

13 BY MR. MUINO:

14 Q Obviously by the time the product was
15 launched, October of 2023, [REDACTED] SOC was ready; is
16 that correct?

17 A You have to understand the software in our
18 work continues on much afterwards, so that work, of
19 course, is still going to be going on until you see
20 commercial products come on the shelves. Hardware
21 is different from software.

22 MR. MUINO: Why don't we take a break.

23 THE VIDEOGRAPHER: Off the record at 9:48 a.m.

24 (A recess was taken from 9:48 a.m. to
25 9:58 a.m.)

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1 THE VIDEOGRAPHER: On the record at 9:58 a.m.

2 MR. BRALY: I would just like to designate this
3 transcript as highly confidential, attorneys' eyes
4 only.

5 BY MR. MUINO:

6 Q Mr. Asghar, I want to go back to the
7 subject of the different [REDACTED] cores. The [REDACTED]
8 core for the [REDACTED] SOC was -- is an Arm-compliant
9 core; correct?

10 A It is based on Arm ISO, yes.

11 Q Do you remember which version of the Arm
12 ISO it's based on?

13 A I believe it's version 8.

14 Q Let me ask you about the [REDACTED] core for
15 the [REDACTED] SOC. You indicated, I think, there were
16 two versions of that [REDACTED] core; is that correct?

17 MR. BRALY: Objection.

18 THE WITNESS: These are two different cores. A
19 [REDACTED] big and [REDACTED] medium. Very different
20 [REDACTED] performance area, like I mentioned earlier.

21 BY MR. MUINO:

22 Q There's a [REDACTED] [REDACTED] and [REDACTED]
23 [REDACTED], both for the [REDACTED] SOC?

24 A That's correct.

25 Q When did Qualcomm start development of the

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1 [REDACTED] big core for [REDACTED]

2 A Not sure of the exact date, but we launch
3 our mobile products every year, and we have
4 basically a cadence based on that.

5 Q Do you know approximately when that
6 development began?

7 A So the SOC development cycles are
8 significant. I don't remember the exact date.

9 Q The engineers who worked on the [REDACTED]
10 big core for [REDACTED] were they the former Nuvia
11 engineers?

12 A This was the combined team from the
13 Qualcomm and our acquisition. This is the Qualcomm
14 custom core team especially.

15 Q The Nuvia team was part of that team for
16 the [REDACTED] big core for [REDACTED] correct?

17 MR. BRALY: Objection.

18 THE WITNESS: They were integrated into a
19 single team with Qualcomm engineers and the acquired
20 talent as well.

21 BY MR. MUINO:

22 Q Has Qualcomm finished developing the
23 [REDACTED] big core for [REDACTED]

24 A I believe so.

25 Q When did that development finish?

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1 A Again, there are hardware aspects and
2 software aspects. [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED].
17 [REDACTED] And the [REDACTED] SOC will include a [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED]?

19 A That's right.

20 Q Is that true for all [REDACTED] SOC, they will
21 include both of those?

22 A [REDACTED] is a single SOC that's called
23 [REDACTED] and that would be this case.

24 Q Do you know offhand how many of the [REDACTED]
25 [REDACTED] and how many of the [REDACTED] are included

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1 in the [REDACTED] SOC?

2 A [REDACTED] has two big cores for mobile and
3 six [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED].

23 [REDACTED] What's the difference between the initial

24 tape out and commercial tape out?

25 A Probably an engineering question, but we

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1 improve quality in various different respects on the
2 SOC.

3 Q Does Qualcomm have an expected time for
4 commercializing the [REDACTED] SOC?

5 A Yes.

6 Q What is that timing?

7 A [REDACTED]

8 [REDACTED] [REDACTED]

9 Q Does Qualcomm have a product name for the
10 [REDACTED] SOC?

11 A Public name?

12 Q Public name.

13 A Not at this time, [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED].

16 Q It will likely be called Snapdragon?

17 A Snapdragon 4.

18 Q And the [REDACTED] SOC is for the mobile
19 market; is that correct?

20 A That is right.

21 Q Let me ask about the [REDACTED] core for the
22 [REDACTED] SOC. Is that currently in development?

23 A Yes, it is being developed.

24 Q You described that as a [REDACTED] [REDACTED]
25 automotive core.

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1 A That's right.

2 Q Is that the only core being developed for
3 the [REDACTED] SOC?

4 A From the CPU perspective, that would be
5 the only core that's being developed.

6 Q When did development of the [REDACTED] core
7 for [REDACTED] start?

8 A I don't remember the exact date.

9 Q The team working on the [REDACTED] core for
10 [REDACTED] does it include the former Nuvia
11 engineers?

12 A I believe it's the Qualcomm custom core
13 team that basically has the team that came from
14 acquisition.

15 Q Has Qualcomm finished developing the
16 [REDACTED] core for [REDACTED]

17 A [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED].

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1 Q [REDACTED]
2 [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]

12 Q Is there a public-facing product name for
13 the [REDACTED] SOC?

14 A I don't -- I'm not aware of one at this
15 time.

16 Q At a technical level, are you aware of the
17 differences between the [REDACTED] core for [REDACTED] for
18 [REDACTED] and for [REDACTED]

19 MR. BRALY: Objection.

20 THE WITNESS: It's a question best answered by
21 the engineering team.

22 BY MR. MUINO:

23 Q To your knowledge, are there differences
24 between those cores?

25 A They're very different markets like I've

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1 talked about. A PC goes into a device. That size
2 of smartphone that's in your hand, it should last a
3 full day. An auto has a much larger battery, but
4 auto places very specific requirements on the core
5 development. You have to have certain capabilities
6 for functional safety in automotive that are very
7 restrictive also. So, all of these markets are very
8 different in terms of what's needed for them.

9 Q Just to make sure I asked this, are you
10 aware at the technical level of any differences
11 between the [REDACTED] core for the [REDACTED] SOC and the
12 [REDACTED] core for the [REDACTED] SOC?

13 MR. BRALY: Objection.

14 THE WITNESS: Again, the question's for
15 engineers, but like I mentioned before, the server
16 market and PC market are vastly different.
17 Requirements are very different between them.

18 BY MR. MUINO:

19 Q Let me ask you now about the [REDACTED]
20 cores. You described the [REDACTED] large and medium
21 cores for the [REDACTED] SOC; correct?

22 A That's right.

23 Q [REDACTED]

24 A [REDACTED]

25 Q [REDACTED]

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1 [REDACTED]
2 [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED].
13 [REDACTED] The team working on the [REDACTED] cores,
14 does it include the former Nuvia engineers?
15 A It basically is the Qualcomm combined CPU
16 team, which includes some of the acquisition and
17 engineering as well.
18 Q The [REDACTED]i SOC, is that for the mobile
19 market?
20 A That's right.
21 Q Has Qualcomm finished development of the
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]

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1 Q [REDACTED]
2 MR. BRALY: Objection.
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED] ¶
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]

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1 Q Does Qualcomm have a public-facing name
2 for the [REDACTED] SOC?

3 A Not at this time.

4 Q Will that likely -- will it likely have a
5 Snapdragon name?

6 A Yes.

7 Q Is that true for the [REDACTED] SOC as
8 well? Will that likely have a Snapdragon name?

9 A I believe so.

10 Q Then you also mentioned the [REDACTED]

11 [REDACTED] cores for the [REDACTED] SOC. [REDACTED]

12 [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 A [REDACTED] [REDACTED]

22 Q [REDACTED]

23 A [REDACTED] [REDACTED] [REDACTED]

24 Q The [REDACTED] SOC is for the PC market; is
25 that correct?

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1 A It is for the PC.

2 Q [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] Is there a public-facing product name for
6 the [REDACTED] SOC?

7 A Not at this time.

8 Q Will it likely have a Snapdragon name?

9 A Yes.

10 Q [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].

13 MR. MUINO: I'd like to mark as the next
14 exhibit, Exhibit 5, which is a document with the
15 Bates label QCARM_275506. It's an e-mail from
16 Mr. Asghar dated May 15, 2013.

17 (Plaintiff's Exhibit 5 was marked for
18 identification by the deposition officer and is
19 attached hereto.)

20 BY MR. MUINO:

21 Q Mr. Asghar, I know this e-mail is from
22 quite some time ago, but do you recognize this
23 e-mail?

24 A It has my name on it, so yes.

25 Q You recognize this as an e-mail that you

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1 sent back in May 2013?

2 A I guess so, yes.

3 Q At this time in May 2013, I think your
4 role was director of QCT strategy; is that correct?

5 A Uh-huh, yes.

6 Q And you say here that you're attaching the
7 Arm analysis. Do you see that?

8 A Yes.

9 Q Do you recall what was the Arm analysis?

10 A Honestly, I don't remember at this time.
11 We analyze companies all the time, so...

12 Q We will take a look at it. Do you see
13 there's an attachment "Arm Strategy 050513"?

14 A Yes.

15 Q Let's take a look at that.

16 A Sure.

17 MR. MUINO: This will be Asghar Exhibit 6.
18 It's a document that starts with the Bates number
19 QCARM_0275507.

20 (Plaintiff's Exhibit 6 was marked for
21 identification by the deposition officer and is
22 attached hereto.)

23 BY MR. MUINO:

24 Q Mr. Asghar, I'll represent this was the
25 document that was produced behind the previous one

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1 that we just looked at, so we can assume this was
2 the attachment. Do you recognize this document?

3 A Yes, since it was done by me, but, yeah.

4 Q You prepared this document?

5 A I worked with the team, like I mentioned,
6 Larry G. and other people that I work with to be
7 able to create this document.

8 Q What is this document generally?

9 A [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED]
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24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]

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1 [REDACTED] [REDACTED]
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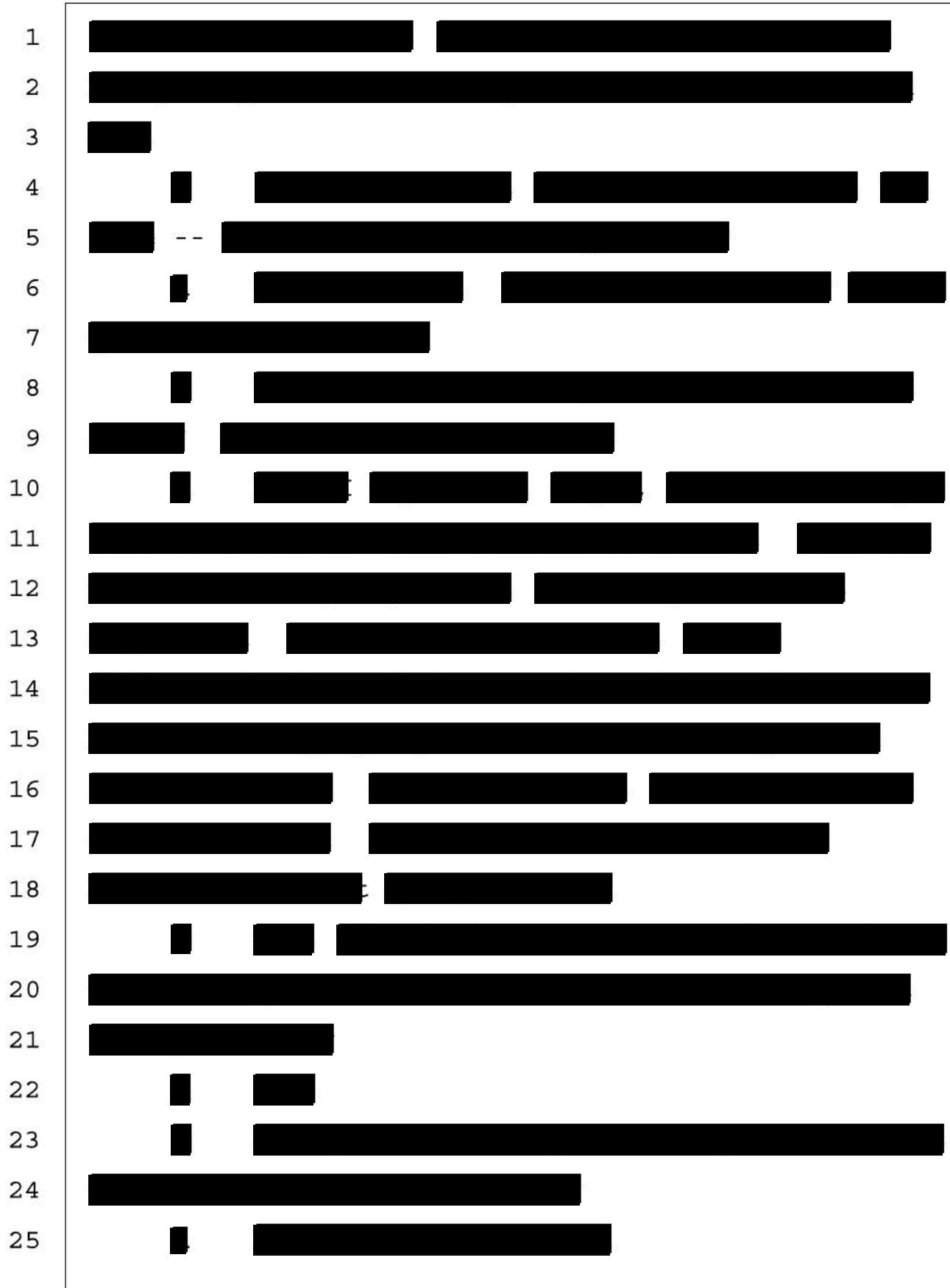
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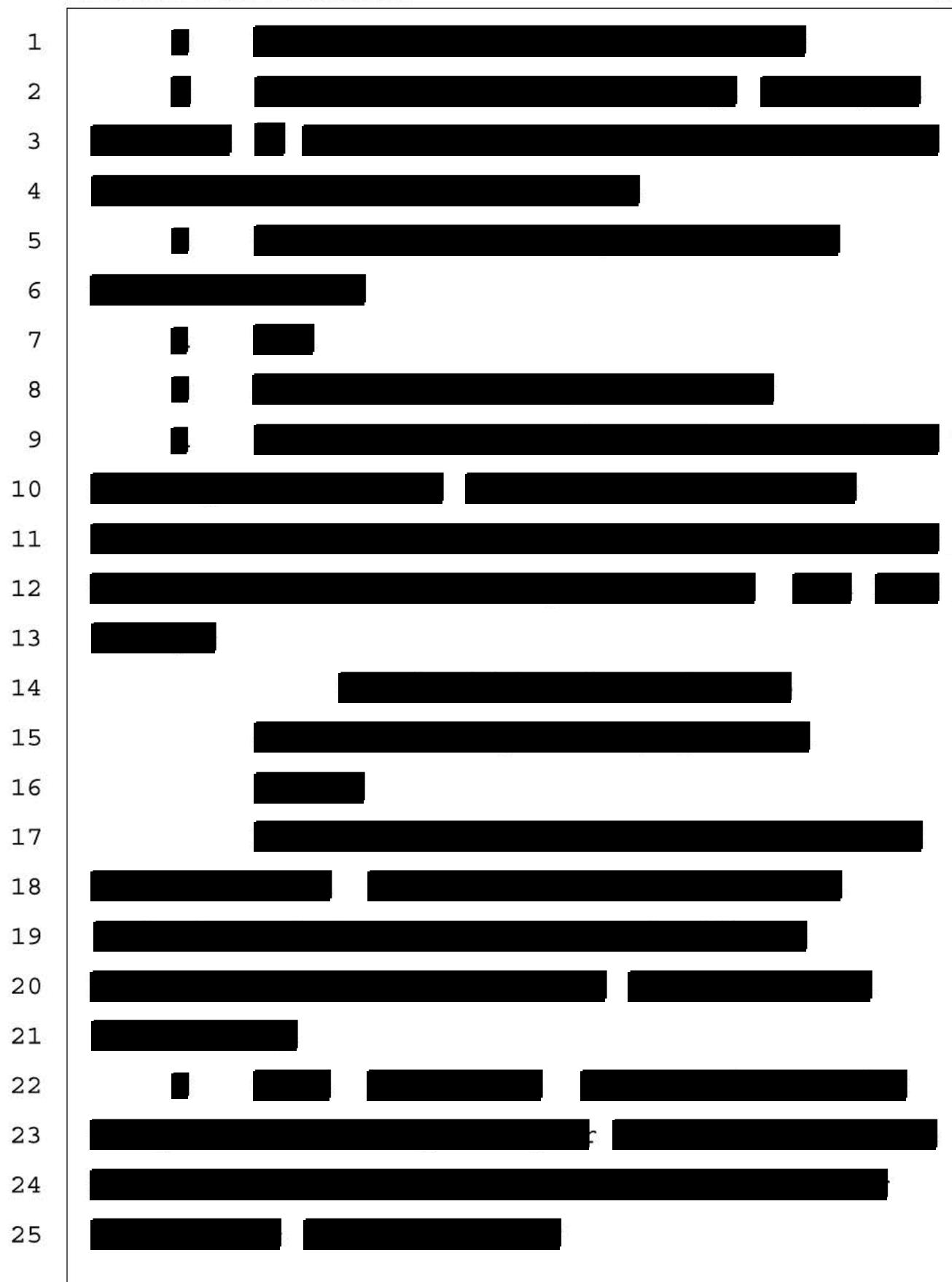
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6	[REDACTED]	
7	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]
9	[REDACTED]	
10	[REDACTED]	[REDACTED]
11	[REDACTED]	
12	[REDACTED]	[REDACTED]
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25	[REDACTED]	[REDACTED]

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1 [REDACTED]
2 [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]

15 MR. MUINO: I'm going to mark as Exhibit 7 a
16 document that has Bates label QCARM_589823: It's an
17 e-mail from RK Chunduru dated March 10 of 2019.

18 (Plaintiff's Exhibit 7 was marked for
19 identification by the deposition officer and is
20 attached hereto.)

21 BY MR. MUINO:

22 Q Mr. Asghar, you can see the subject of
23 this e-mail chain is [REDACTED]. "

24 Do you see that?

25 A Yes.

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1 Q I want to first look at the e-mail at the
2 bottom from someone named Akash Palkhiwala?

3 A You did good.

4 Q P-a-l-k-h-i-w-a-l-a?

5 A That's right.

6 Q Who is that?

7 A He's currently the CFO of Qualcomm.

8 Q [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 A [REDACTED]

17 Q [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED]

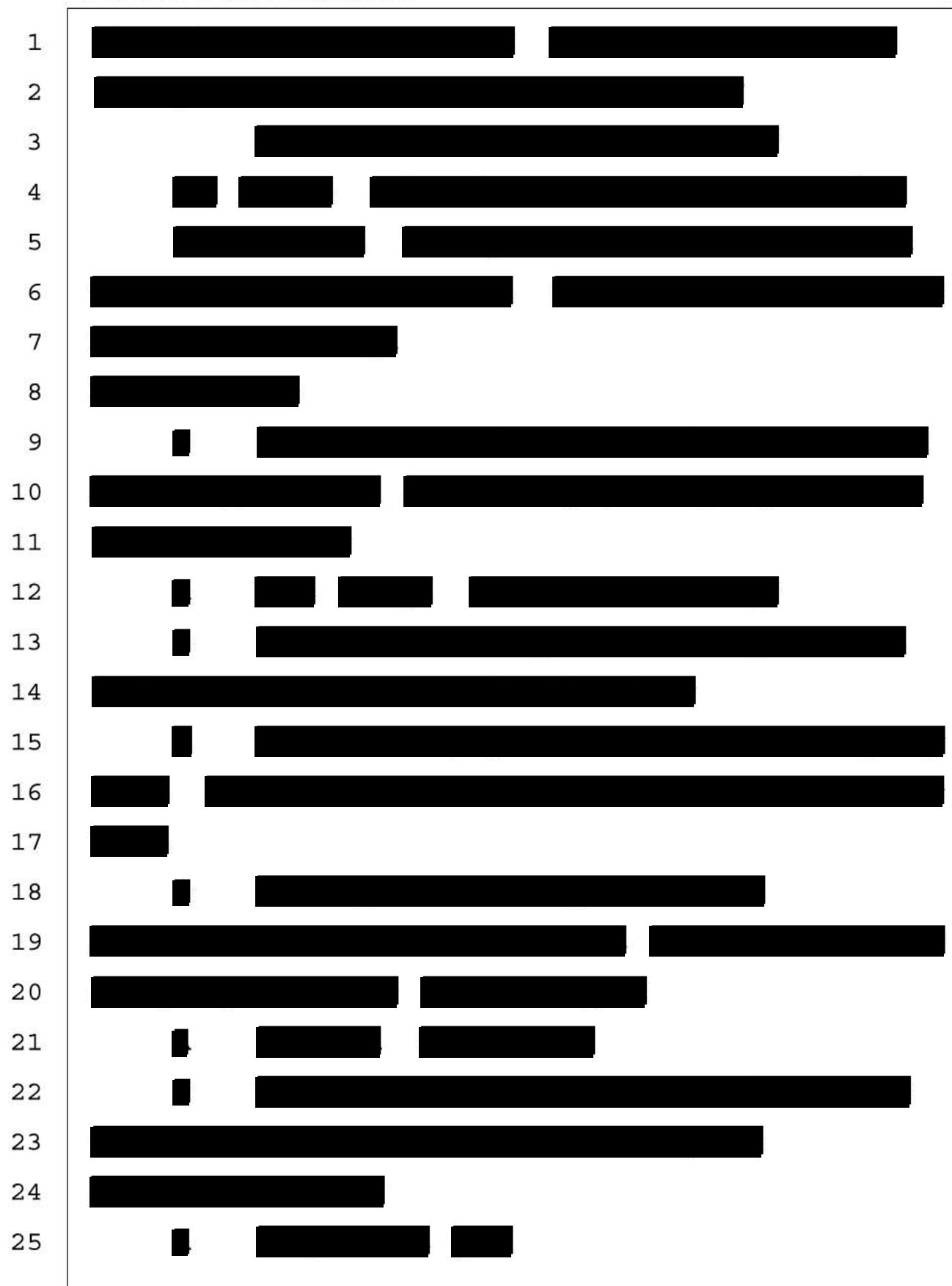
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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED]

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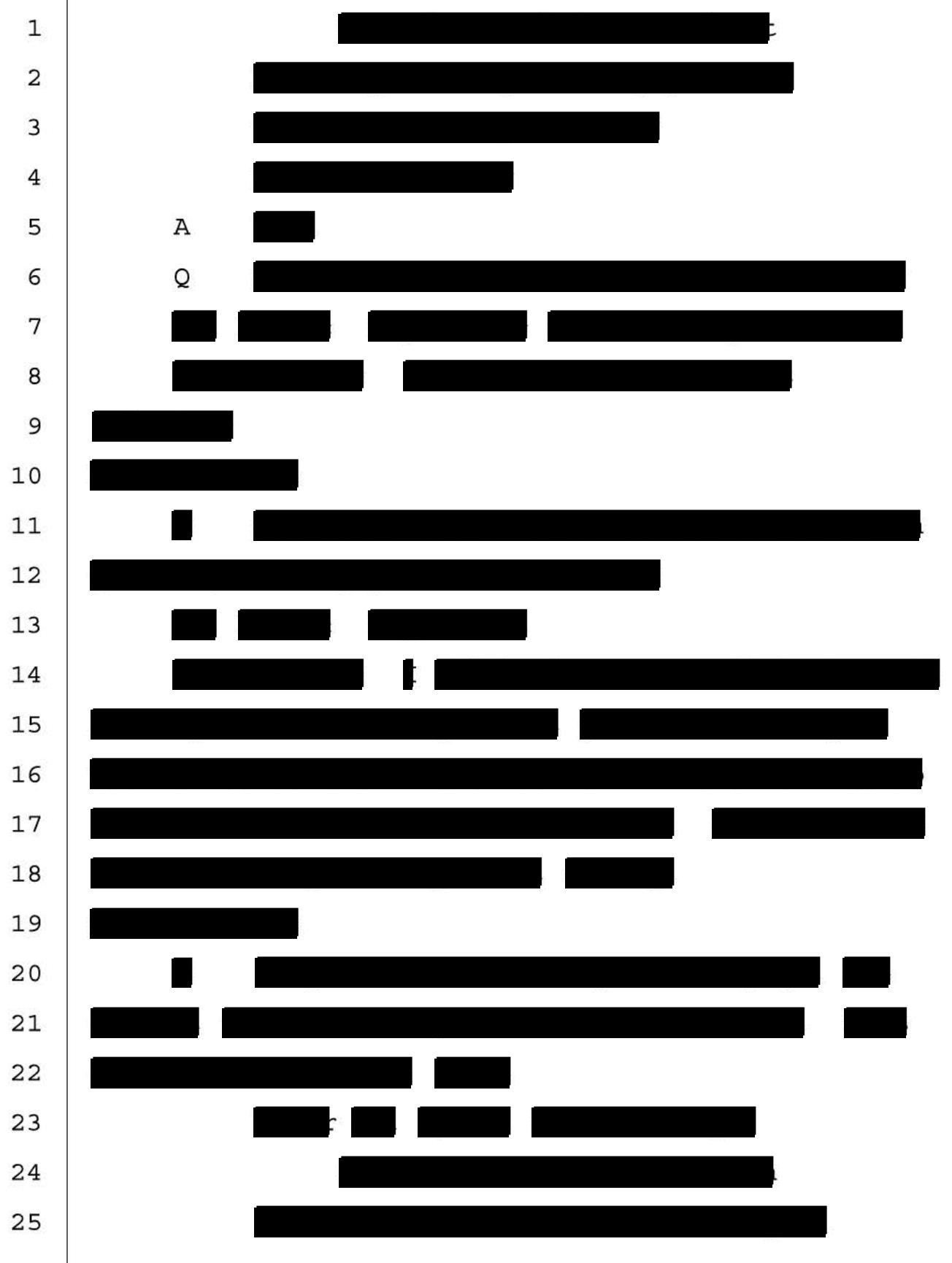
92

1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]	[REDACTED]
21	[REDACTED]	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]	[REDACTED]
23	[REDACTED]	[REDACTED]	[REDACTED]
24	[REDACTED]	[REDACTED]	[REDACTED]
25	[REDACTED]	[REDACTED]	[REDACTED]

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ARM, LTD. V. [REDACTED]

1	[REDACTED]
2	[REDACTED]
3	[REDACTED]
4	[REDACTED]
5	[REDACTED]
6	[REDACTED]
7	[REDACTED]
8	[REDACTED]
9	[REDACTED]
10	[REDACTED]
11	[REDACTED]
12	[REDACTED]
13	[REDACTED]
14	[REDACTED]
15	[REDACTED]
16	[REDACTED]
17	[REDACTED]
18	[REDACTED]
19	[REDACTED]
20	[REDACTED]
21	[REDACTED]
22	[REDACTED]
23	[REDACTED]
24	[REDACTED]
25	[REDACTED]

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1 [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 A [REDACTED]
5 Q [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 [REDACTED] MUIINO: I'm going to mark as Exhibit 8 a
19 document that starts with the Bates No. 578571.
20 It's an e-mail chain from September of 2019.

21 (Plaintiff's Exhibit 8 was marked for
22 identification by the deposition officer and is
23 attached hereto.)

24 BY MR. MUIINO:

25 Q You see the subject of this e-mail chain

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1 is [REDACTED]."

2 A Yes.

3 Q Do you see that?

4 A Yes.

5 Q [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q I see one of the recipients of this e-mail
18 is Keith Kressin; do you see that?

19 A Yes.

20 Q At one point in time he was your boss?

21 A That's right.

22 Q If we look at the last e-mail on the first
23 page of this document, it's from Keith Kressin dated
24 September 9, 2019 at 10:31 a.m.

25 Do you see that?

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1 A Yes .

2 Q [REDACTED]

3 says :

4 [REDACTED]

5 [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 A [REDACTED]

11 Q [REDACTED]

12 A [REDACTED]

13 Arm .

14 Q [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]

20 [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]

22 Q Approximately how long does it take for
23 Qualcomm to develop a custom Arm-compliant core on
24 average?

25 A It's difficult to answer. It really

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1 depends on the kind of core that you're trying to
2 make.

3 Q Can you give me a range of time, a year,
4 two years, three years?

5 A You can create a small core very quickly.
6 A bigger core might take longer. I don't have a
7 good feel for exact times. It depends on the team
8 and depends on so many factors.

9 MR. MUINO: I'm going to mark as Exhibit 9 a
10 document that has the Bates number QCARM_339632.

11 (Plaintiff's Exhibit 9 was marked for
12 identification by the deposition officer and is
13 attached hereto.)

14 BY MR. MUINO:

15 Q Mr. Asghar, have you seen this document
16 before?

17 A I think I might have seen it, yes.

18 Q Did you create this document?

19 A I'm not sure. I don't think so, but could
20 be somebody on my team.

21 Q Let's go to the second page of the
22 document which has the number 339633. At the top do
23 you see it says [REDACTED]

24 [REDACTED]

25 A Yes.

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1 Q [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 A [REDACTED] [REDACTED]
6 Q [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 A [REDACTED]
5 Q [REDACTED] [REDACTED]
6 A [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 Q For the court reporter, RISC-V is
R-I-S-C-V. Presently does Qualcomm have any plans
to use RISC-V?
A Yes. We have actually made a public
statement about it also, where we are planning to do

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1 a wearables SOC for a smart watch market that will
2 use a RISC-V CPU.

3 Q Sorry, go ahead.

4 A And we have used RISC-V cores in our
5 products for a long time.

6 Q There are other RISC-V cores in Qualcomm's
7 products?

8 A Yes.

9 Q [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED]

8 MR. MUINO: I'm going to mark as Exhibit 10 a
9 document that starts with the Bates number
10 QCARM_3521328. This is an e-mail chain from June of
11 2020.

12 (Plaintiff's Exhibit 10 was marked
13 for identification by the deposition officer and is
14 attached hereto.)

15 BY MR. MUINO:

16 Q Mr. Asghar, I'd like to go to page 3 of
17 this document. It has the number 3521330 at the
18 bottom.

19 A Uh-huh.

20 Q Look at the e-mail on the bottom half of
21 the page from Steve Mollenkopf.

22 Do you see that?

23 A Yes.

24 Q M-o-l-l-e-n-k-o-p-f. Who is
25 Mr. Mollenkopf?

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1 A Ex-CEO of Qualcomm.

2 Q At the time he was writing to, among
3 others, Cristiano Amon. Mr. Amon, what role did he
4 have at this time?

5 A He was the president of Qualcomm at that
6 time.

7 Q Mr. Mollenkopf appears to be forwarding an
8 e-mail from somebody named Lip-Bu Tan.

9 Do you see that?

10 A Yes.

11 Q Do you know who he was?

12 A I think he was on the board of some
13 company. I'm not sure which one.

14 Q Do you know if he was on the board of
15 Nuvia?

16 A I'm not sure. I have to confirm. I
17 recall something like that, but I'm not sure.

18 Q Did you have any interaction with Mr. Tan?

19 A Not directly that I recall.

20 Q [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED]
9 A [REDACTED]
10 Q [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 Q If you look at the e-mail just above that,
23 it's from Jim Thompson dated June 14, 2020.
24 Do you see that?
25 A Yes.

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1 Q Who is Mr. Thompson?
2 A CTO of Qualcomm.
3 Q [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 A [REDACTED]
9 Q [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED]

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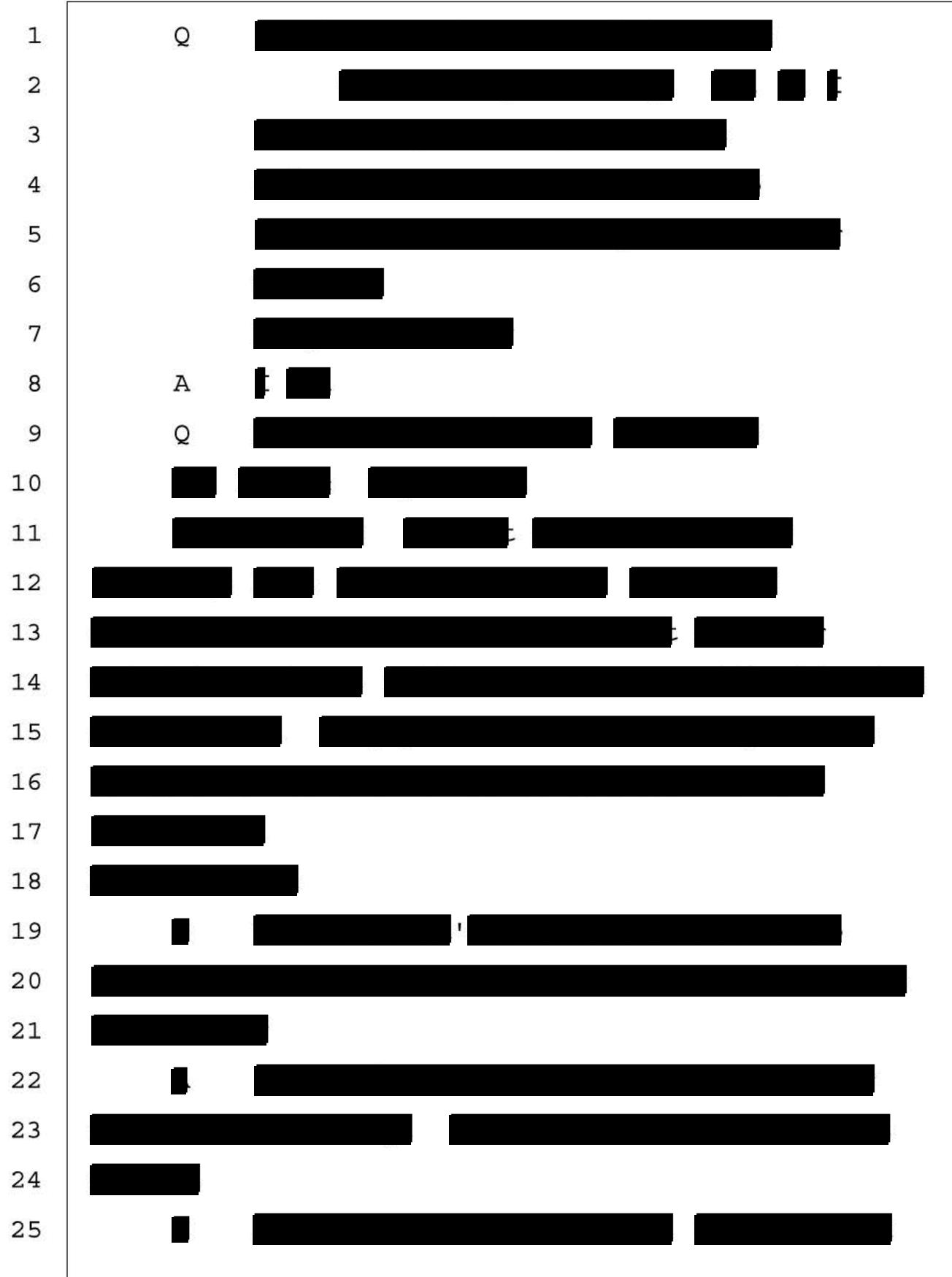
109

1 [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED].

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1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]		
6	[REDACTED]		
7	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]		
10	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]		
12	[REDACTED]		
13	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]		
15	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]		
17	[REDACTED]		
18	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]		
20	[REDACTED]		
21	[REDACTED]	[REDACTED]	[REDACTED]
22	[REDACTED]		
23	[REDACTED]	[REDACTED]	[REDACTED]
24	[REDACTED]	[REDACTED]	[REDACTED]
25	[REDACTED]		

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1 Q So at this point in June 2020, Qualcomm
2 was aware that Nuvia was developing a core for the
3 server market, but Qualcomm wanted a core for the
4 mobile market?

5 A Mobile PC and all the markets we operate.

6 Q Qualcomm was asking Nuvia if they could
7 pivot to developing a core on mobile?

8 A No. My understanding was they would
9 continue to work on their [REDACTED] SOC with their CPU
10 for servers and create a new CPU for us because they
11 were a pretty capable team. We would take that and
12 put it into our product. It would be a parallel
13 effort, not pivot completely as a company, no.

14 Q [REDACTED] [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A [REDACTED]

21 Q [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED]

25 [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED].
11 Q [REDACTED] [REDACTED]
12 A [REDACTED]
13 Q Who is Quinn Li?
14 A Our head of ventures. So this is the
15 division that funds and invests in startups.
16 Q [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED]
15 [REDACTED] [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 Q Were you in favor of Qualcomm investing in
23 Nuvia at this time?

24 A Yes, I was.

25 Q Why were you?

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1 A Because, again, like I said, Arm was
2 incapable of allowing us to succeed and be
3 competitive. We needed a better option. Again, my
4 focus is product. I want to win with the best
5 products in the market and Arm wasn't getting us
6 there.

7 MR. MUINO: All right, let's take a break.

8 THE WITNESS: Sure.

9 THE VIDEOGRAPHER: Off the record at 11:08 a.m.

10 (A recess was taken from 11:08 a.m.
11 to 11:20 a.m.)

12 THE VIDEOGRAPHER: On the record at 11:20 a.m.

13 MR. MUINO: I want to mark as Exhibit 11 a
14 document that starts with the Bates number
15 QCARM 591733.

16 (Plaintiff's Exhibit 11 was marked
17 for identification by the deposition officer and is
18 attached hereto.)

19 BY MR. MUINO:

20 Q Mr. Asghar, do you see this is an e-mail
21 chain from August of 2020?

22 A Uh-huh.

23 Q And the subject is "Nuvia Update";
24 correct?

25 A Yes.

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1 Q Do you recognize this e-mail chain?

2 A Yes.

3 Q You see your name is on here; correct?

4 A Uh-huh.

5 Q Let's go to the last page, which has the
6 number 5911736 and start with the earliest e-mail in
7 this chain.

8 A Thirty-six.

9 Q 736?

10 A Got it.

11 Q This e-mail is from Mr. Chunduru dated
12 August 26, 2020; correct?

13 A Yes.

14 Q Mr. Chunduru says:

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 Do you see that?

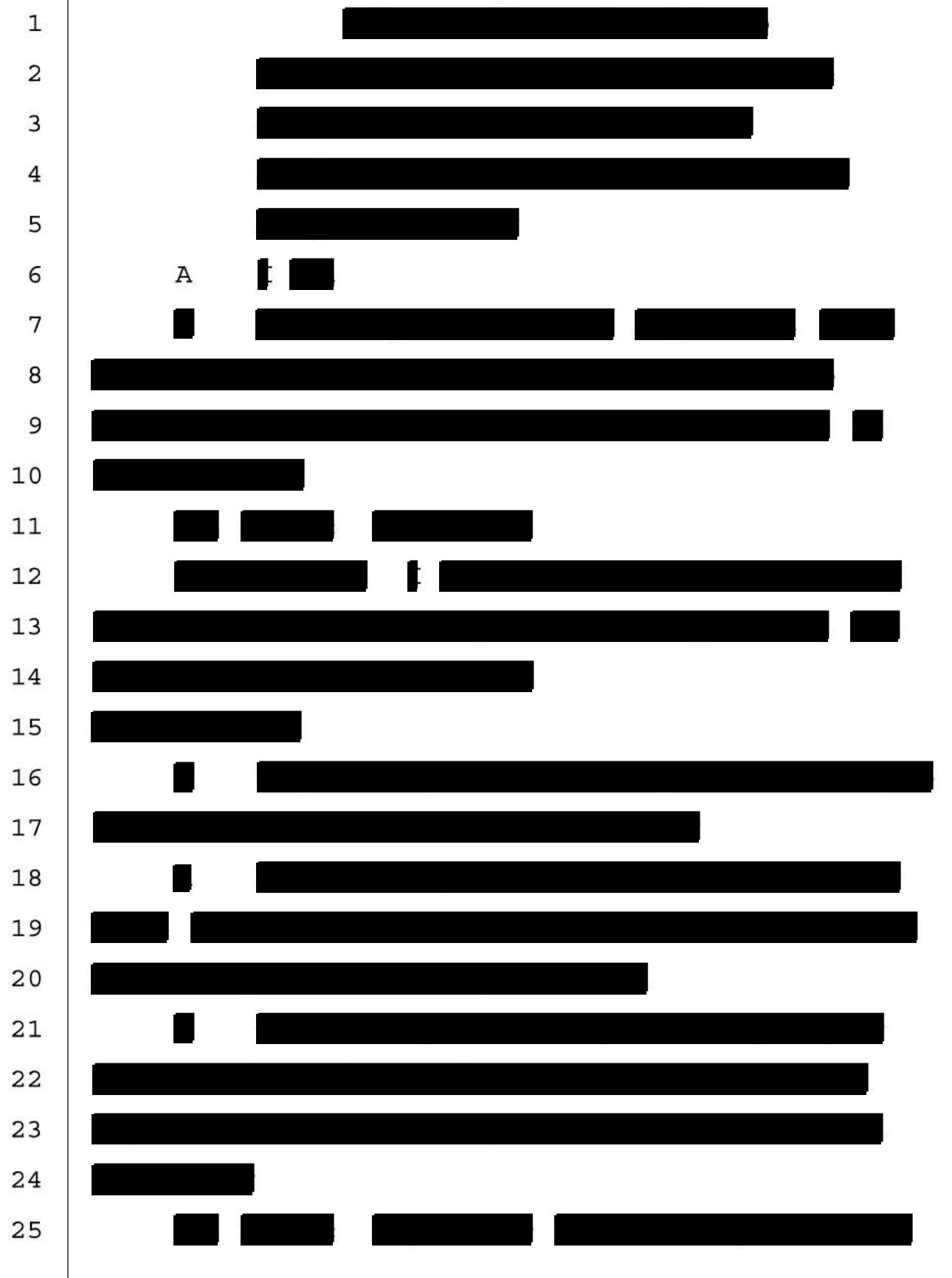
24 A Yes, I do.

25 Q It goes on to say:

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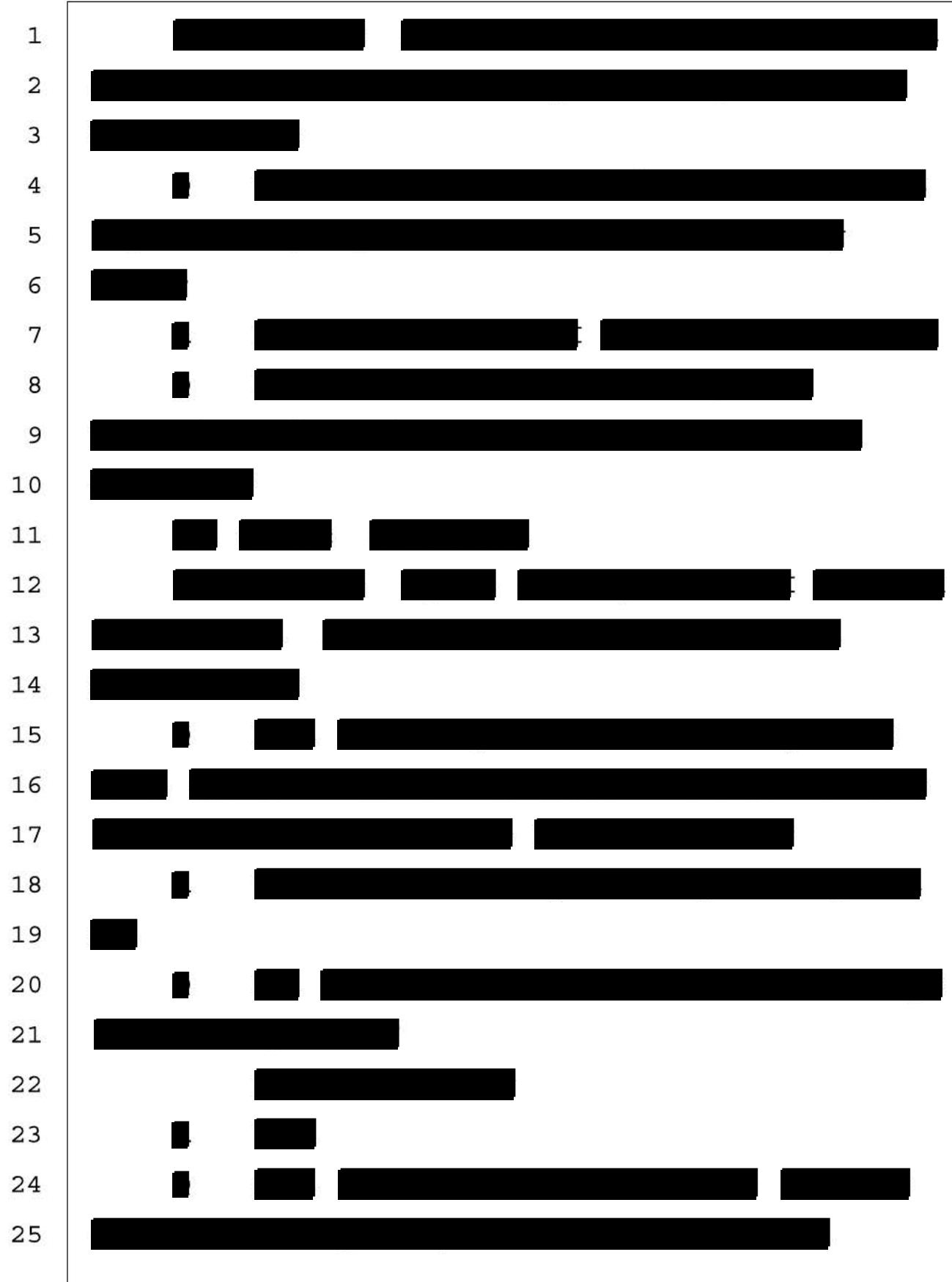
117



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1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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25	[REDACTED]			

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1 [REDACTED] [REDACTED]
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1 [REDACTED]
2 A [REDACTED]
3 Q [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED]
7 [REDACTED]
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12 A [REDACTED]
13 Q [REDACTED]
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9 [REDACTED] [REDACTED]

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22 [REDACTED] [REDACTED]

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17 [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]

20 MR. MUINO: I'm going to mark as Exhibit 12 a
21 document that starts with the Bates number
22 QCARM_25838.

23 (Plaintiff's Exhibit 12 was marked
24 for identification by the deposition officer and is
25 attached hereto.)

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1 BY MR. MUINO:

2 Q Mr. Asghar, do you see this is an e-mail
3 chain from January of 2021?

4 A Uh-huh.

5 Q Is that correct?

6 A Yes.

7 Q And you see you are one of the
8 participants in this e-mail chain?

9 A Yes.

10 Q The subject of these e-mails is "Qualcomm
11 announces definitive agreement to acquire Nuvia."

12 Do you see that?

13 A Yes, I do.

14 Q Let's go to the bottom of page 1. There's
15 an e-mail from Mr. Amon dated January 13, 2021.

16 Do you see that?

17 A Yes, I do.

18 Q And it appears Mr. Amon is sending this
19 e-mail to Qualcomm.all; correct?

20 A Uh-huh.

21 Q Is that correct?

22 A That's right.

23 Q And Qualcomm.all, is that everybody at
24 Qualcomm?

25 A I believe so. It should be a list.

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1 Q This is an announcement of the Nuvia
2 acquisition to the entire company; correct?
3 A [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

16 Q What involvement did you have in the
17 discussions with Nuvia?

18 A More of the discussion of how do we use
19 the custom core capabilities to create best-in-class
20 products. So my focus is Roadmap and products, and
21 that's what I'm primarily focused on.

22 Q Generally speaking, what were the terms of
23 the Nuvia acquisition?

24 MR. BRALY: Objection.

25 THE WITNESS: So we have a separate team that

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1 does M&A that goes into all the details of the deal
2 structure and everything, but that's not my primary
3 role.

4 BY MR. MUINO:

5 Q Do you recall the amount that was paid for
6 Nuvia?

7 A I believe publicly the amount was
8 1.4 billion.

9 Q And to your knowledge Qualcomm was
10 obtaining the entirety of Nuvia?

11 A That's my understanding, yes.

12 Q Qualcomm was obtaining control over
13 Nuvia's management by the acquisition; is that
14 correct?

15 MR. BRALY: Objection.

16 THE WITNESS: Yes.

17 BY MR. MUINO:

18 Q There were no parts of Nuvia to your
19 knowledge that were left behind?

20 MR. BRALY: Objection.

21 THE WITNESS: I'm not aware.

22 BY MR. MUINO:

23 Q Through the acquisition, Qualcomm obtained
24 Nuvia's technology that it had developed to that
25 point?

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1 MR. BRALY: Objection.

2 THE WITNESS: An acquisition would, of course,
3 have everything that the company has.

4 BY MR. MUINO:

5 Q Did that include the [REDACTED] core that
6 Nuvia was developing for the [REDACTED] SOC?

7 MR. BRALY: Objection.

8 THE WITNESS: We basically acquired the [REDACTED]
9 SOC along with Nuvia, which was a server chip, of
10 course, and everything that it entails.

11 BY MR. MUINO:

12 Q Did all of Nuvia's personnel come over to
13 Qualcomm?

14 A That's a good question. I honestly don't
15 know if some chose not to, but there might have been
16 some like that.

17 Q To your knowledge most of them chose to
18 come over to Qualcomm?

19 A I believe so.

20 Q Let's look at Mr. Amon's e-mail. In the
21 second paragraph, the last sentence says:

22 "We expect to integrate Nuvia
23 CPUs across Qualcomm's portfolio of
24 products, powering next generation
25 laptops, flagship smartphones,

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1 digital cockpit, ADAs and
2 infrastructure networking
3 solutions."

4 Do you see that?

5 A Yes.

6 Q The Nuvia CPUs that are mentioned here, is
7 that the [REDACTED] core that Nuvia had been
8 developing?

9 MR. BRALY: Objection; calls for speculation.

10 THE WITNESS: It means Qualcomm's custom CPUs
11 because, like we just discussed, right, those are
12 for server class, and these products are vastly
13 different. These are PCs and laptops and
14 smartphones, and those products, so this is Qualcomm
15 custom cores is what he means in going into those
16 products.

17 BY MR. MUINO:

18 Q He says "Nuvia CPUs"; correct?

19 A Yes.

20 Q [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] that
25 goes into a server product versus a smartphone

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1 [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED]

4 Q What Qualcomm was acquiring with the
5 acquisition of Nuvia was Nuvia's CPU cores; correct?

6 MR. BRALY: Objection.

7 THE WITNESS: They were acquiring primarily, as
8 you've seen from all the discussion that we've had
9 in the past, a CPU team more than anything else,
10 because very clearly the server, like I've seen from
11 previous discussion, was not what we needed. We
12 needed a CPU core for very different markets, for
13 PC, for smartphones, for XR, for ADAs, for IBI. So
14 we had to design those cores essentially with that
15 team plus ours.

16 BY MR. MUINO:

17 Q Sure, I understand. I want to focus on
18 the time of acquisition, though. This is
19 January 13, 2021. So Qualcomm had not yet acquired
20 Nuvia at this time; correct?

21 A Yes.

22 Q It was making an announcement internally
23 it was going to acquire Nuvia.

24 A Yes.

25 Q Mr. Amon is referring to Nuvia CPUs at

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1 this time in January 2021; correct?

2 A Yes.

3 Q Those were CPUs that Nuvia had developed
4 prior to its acquisition; right?

5 MR. BRALY: Objection; calls for speculation.

6 THE WITNESS: Again, it's very clear to anybody
7 who is in this area that he does not mean exactly
8 the same CPUs, because if you made a smartphone with
9 a server CPU, it would last five minutes and burn a
10 hole in your hand. I think anybody who is aware
11 knows what he means by this, that we would develop
12 custom cores for these markets. You cannot take a
13 server CPU into a smartphone. Your phone would
14 literally last a few minutes.

15 BY MR. MUINO:

16 Q Let's try to focus, Mr. Asghar, on what
17 I'm asking. I'm not asking about what Qualcomm did
18 subsequently, I'm asking about what was being
19 acquired through the acquisition of Nuvia. Nuvia
20 had developed some CPU cores, right; is that
21 correct?

22 A Yes.

23 Q And specifically the core that they had
24 developed was called [REDACTED] right?

25 A For servers, yes.

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1 Q That was a core for the [REDACTED] SOC;
2 correct?

3 A That's right.

4 Q The [REDACTED] SOC was for the server market;
5 is that right?

6 A That's right.

7 Q So that [REDACTED] core was part of what
8 Qualcomm was acquiring when it acquired Nuvia;
9 right?

10 MR. BRALY: Objection.

11 THE WITNESS: We were acquiring the entire
12 Nuvia team. Yes.

13 BY MR. MUINO:

14 Q I'm not asking about the team. Part of
15 what Qualcomm was acquiring when it acquired Nuvia
16 was the Nuvia [REDACTED] core; correct?

17 MR. BRALY: Objection.

18 THE WITNESS: Yes. All the assets came along,
19 yes, but this statement is talking about future
20 product plans. I think that should be quite clear,
21 right? We expect to integrate such that we are
22 clear on that.

23 BY MR. MUINO:

24 Q But, again, I just -- I think you answered
25 my question. Part of what Qualcomm was acquiring

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1 when it acquired Nuvia was the Nuvia [REDACTED] core;
2 correct?

3 MR. BRALY: Objection; asked and answered.

4 THE WITNESS: Yes.

5 BY MR. MUINO:

6 Q What Mr. Amon is saying here is "We expect
7 to integrate the Nuvia CPUs across Qualcomm's
8 portfolio of products"; correct?

9 A That's what he's saying, but this is not
10 something that you should look at as exactly the
11 same CPU. Like I'm explaining from a technology
12 perspective, you cannot do that. So the audience is
13 well aware of the fact that this will be newly
14 defined, newly designed CPUs that would be very
15 different in nature to be able to meet the
16 requirements of these different product lines.

17 Q That's not what Mr. Amon says in this
18 e-mail; right?

19 MR. BRALY: Objection; mischaracterizes the
20 document.

21 BY MR. MUINO:

22 Q Is that right?

23 A I'm telling you, you can ask anybody --
24 pick out any of the Qualcomm.all and ask them what
25 this means. They will say it could not be the same

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1 CPU because the server CPU is vastly different than
2 the CPU that goes into a smartphone. That's why we
3 were negotiating with them to create a different CPU
4 for us because we knew a server CPU cannot go into a
5 smartphone. So what he's saying over there is
6 Qualcomm cores, Qualcomm CPUs will be designed to go
7 into these markets.

8 Q It was Qualcomm's intent to use the
9 [REDACTED] core that Nuvia had developed, correct,
10 after the acquisition?

11 MR. BRALY: Objection.

12 THE WITNESS: It was Qualcomm's intent to use
13 the Qualcomm custom core team to design different
14 custom cores for these very different markets than
15 what Nuvia was working on.

16 BY MR. MUINO:

17 Q Was Qualcomm planning to throw away the
18 [REDACTED] core that Nuvia had developed?

19 MR. BRALY: Objection.

20 THE WITNESS: As we discussed earlier, there
21 was an [REDACTED] product which we as a company could
22 choose to continue or not, but it would exist in
23 that SOC. For these other markets, smartphone, PC,
24 XR, automotive, we would need new cores.

25 ///

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5 1 BY MR. MUINO:

6 Q 2 Is it your position, Mr. Asghar, that the
7 [REDACTED] 3 core that was developed for the [REDACTED] SOC
8 was a completely different core from the [REDACTED]
9 core that Nuvia had developed?

10 A 6 Again, a question for engineering. Like
11 I've explained to you, the requirements on a CPU are
12 different. The features are very different for a PC
13 end product compared to a server end product. So
14 these cores are different.

15 Q 11 From an engineering perspective, you don't
16 know what the differences are, if any, between the
17 [REDACTED] 12 core for the [REDACTED] SOC that Nuvia had
18 developed and the [REDACTED] 13 core for the [REDACTED] SOC;
19 right?

20 A 16 You would have to talk with engineers on
21 that.

22 Q 18 Is that correct, you don't know those
23 differences at a technical level?

24 MR. BRALY: 20 Objection.

25 THE WITNESS: 21 I don't know the exact technical
26 details of each difference between the cores.

27 BY MR. MUINO:

28 Q 24 You don't know if those two [REDACTED] cores,
29 the one for [REDACTED] 25 and the one for [REDACTED] are

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1 95 percent the same, 80 percent the same, 50 percent
2 the same? You don't know that?

3 MR. BRALY: Objection.

4 THE WITNESS: I don't know that.

5 BY MR. MUINO:

6 Q Are you aware that some of the design from
7 the [REDACTED] core for [REDACTED] was carried over to the
8 [REDACTED] core for [REDACTED]

9 MR. BRALY: Objection.

10 THE WITNESS: I don't know that.

11 BY MR. MUINO:

12 Q At the time of Qualcomm's acquisition of
13 Nuvia, did Nuvia have any products other than the
14 [REDACTED] core and the [REDACTED] SOC to your knowledge?

15 MR. BRALY: Objection.

16 THE WITNESS: I don't know what their internal
17 plans were, but as far as I'm aware they did not.

18 BY MR. MUINO:

19 Q In advance of the acquisition, did
20 Qualcomm undertake an evaluation of the [REDACTED]
21 [REDACTED] [REDACTED]?

22 A Like I mentioned earlier, we, of course,
23 got high-level information from them to understand
24 what their capabilities are. When you're acquiring
25 a company, you want to understand the capabilities

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1	[REDACTED]
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13	[REDACTED]
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18	[REDACTED]
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1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]

5 MR. MUINO: I'm going to mark as Exhibit 13 a
6 document that starts with the Bates number
7 QCARM_2470.

8 (Plaintiff's Exhibit 13 was marked
9 for identification by the deposition officer and is
10 attached hereto.)

11 BY MR. MUINO:

12 Q Mr. Asghar, do you recognize this as a
13 Qualcomm press release dated January 13, 2021?

14 A That's right, I do.

15 Q And it looks like that was the same date
16 as the internal e-mail to Qualcomm personnel that we
17 looked at; correct?

18 A That's right.

19 Q Were you involved at all in preparing this
20 press release?

21 A No, this is our marketing team that
22 normally does this.

23 Q Was this the first time to your knowledge
24 that Qualcomm had publicly announced the Nuvia
25 acquisition?

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1 MR. BRALY: Objection.

2 THE WITNESS: I'm not sure, but I would think
3 so.

4 BY MR. MUINO:

5 Q In the first paragraph says -- I'm looking
6 at the first paragraph with the small text.

7 "San Diego, January 13, 2021,

8 Qualcomm Incorporated today
9 announced that its subsidiary,
10 Qualcomm Technologies, Inc., has
11 entered into a definitive agreement
12 to acquire Nuvia for approximately
13 \$1.4 billion before working capital
14 and other adjustments."

15 Do you see that?

16 A Yes.

17 Q And you testified previously to your
18 knowledge that was the amount, the full amount of
19 the -- of what Qualcomm paid to acquire Nuvia?

20 A That's my understanding, yes.

21 Q Were you involved in determining that
22 price?

23 A No. Like I said, we have an M&A team that
24 normally does that.

25 Q Who led that team?

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1 A I believe that team is led by Dane Melles.

2 Q What's the last name?

3 A M-e-l-l-e-s.

4 Q Is he still with Qualcomm?

5 A Yes, he is.

6 Q Do you know how that price was determined?

7 A [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 Q If you go to the second page of this
11 document, it has the number 2471.

12 A Yes.

13 Q And you look at the fourth paragraph, it
14 says:

15 "Qualcomm's broad ecosystem of
16 partners have voiced strong support
17 for this acquisition."

18 Do you see that?

19 A Yes, I do.

20 Q There's a list of partners here that
21 includes Microsoft, Google, Samsung.

22 Do you see that list?

23 A Yes.

24 Q It looks like these companies provided
25 some quotes to Qualcomm for inclusion in this press

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1 release.

2 A Uh-huh, yes.

3 Q To your knowledge, Qualcomm had informed
4 these companies prior to the acquisition that the
5 acquisition was going to happen?

6 A I would suspect so for them to be able to
7 provide the quotes, but I was not involved in that.

8 Q Do you know who communicated with these
9 companies about the Nuvia acquisition?

10 A I don't.

11 Q Do you know what was communicated to them?

12 A I don't.

13 Q Now, if you look down the list, I don't
14 see Arm. Is Arm on that list?

15 A I wouldn't expect them to be.

16 Q I'm sorry, I missed that?

17 A I wouldn't expect them to be.

18 Q You would not? Why would you not expect
19 Arm to be on this list?

20 A These are all customers, these are not
21 suppliers. These are all customers.

22 Q Does Qualcomm regard Arm as a partner?

23 A They're a supplier, not a customer. They
24 supply something to us rather than we supply
25 something to them.

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1 Q To your knowledge, did Qualcomm inform Arm
2 of the Nuvia acquisition prior to the public
3 announcement?

4 A I'm not aware. I don't actually know.

5 Q You're not sure one way or another whether
6 Qualcomm informed Arm of the Nuvia acquisition
7 before it was publicly announced on January 13 of
8 2021?

9 A Yes, I don't know.

10 MR. MUINO: I'm going to mark as Exhibit 14 a
11 document that starts with Bates number QCARM_
12 3965338.

13 (Plaintiff's Exhibit 14 was marked
14 for identification by the deposition officer and is
15 attached hereto.)

16 BY MR. MUINO:

17 Q Mr. Asghar, do you recognize this as an
18 e-mail chain from February 2021?

19 A Yes, I do.

20 Q You see that you are included on this
21 e-mail chain?

22 A Yes.

23 Q Let's go to the second page with the
24 number 65339 and look at the e-mail at the bottom.
25 It's from Ben Golay.

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1 Do you see that?

2 A Yes.

3 Q G-o-l-a-y. Who is Mr. Golay?

4 A I honestly don't know who that is. I
5 haven't worked with him.

6 Q The e-mail is dated February 8, 2021. Do
7 you see that?

8 A Yes.

9 Q And the subject is "Jim Thompson All Hands
10 Meeting Slides."

11 Do you see that?

12 A Yes.

13 Q It says in the first paragraph:

14 | Page

15

16 | Page

17 | Page

18 | Page

19 | Page

20 | Page

21 Do you see that?

22 A Yes.

23 | Page

24 | Page

25 MR. BRALY: Objection; calls for speculation.

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1 THE WITNESS: I do not.

2 BY MR. MUINO:

3 Q You weren't involved in that process?

4 A No.

5 Q The second paragraph here says:

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 Do you see that?

15 A Yes.

16 Q [REDACTED]

17 [REDACTED]

18 A I don't.

19 Q That's not something that you were
20 involved with?

21 A No.

22 MR. MUINO: I'm going to mark as Exhibit 15 a
23 document with the Bates number QCARM_25780.

24 (Plaintiff's Exhibit 15 was marked
25 for identification by the deposition officer and is

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1 attached hereto.)

2 BY MR. MUINO:

3 Q Mr. Asghar, do you see this is an e-mail
4 dated January 20th, 2021 with the subject "Nuvia
5 Firewall Access Guidelines."

6 Do you see that?

7 A Yes.

8 Q And you are a participant in this e-mail?

9 A Yes.

10 Q The e-mail is from somebody named Raghu
11 Sankuratri?

12 A That's right.

13 Q Who is he?

14 A He used to be at Qualcomm. He's no longer
15 there if I'm right, but he used to work on the CPU
16 team.

17 Q He was an engineer?

18 A Yes.

19 Q In the body of the e-mail he says:

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 Do you see that?

24 A Yes.

25 Q He continues with:

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1

[REDACTED]

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

[REDACTED]

9

[REDACTED]

10 Do you see that?

11 A Yes.

12 Q [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 BY MR. MUINO:

18 Q What did you understand that to mean when
19 you received this e-mail?

20 A I don't recall. I mean, I receive
21 honestly hundreds of e-mails in a given day.

22 BY MR. MUINO:

23 Q The Nuvia Core CPU Team, was that the team
24 that would be working on the [REDACTED] core?

25 MR. BRALY: Objection; calls for speculation.

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1 THE WITNESS: Again, not sure what he's
2 thinking. He probably is in a better position to
3 answer that.

4 BY MR. MUINO:

5 Q The reference here to Nuvia core, did you
6 understand that to mean the [REDACTED] core?

7 MR. BRALY: Objection.

8 THE WITNESS: I did not.

9 BY MR. MUINO:

10 Q What did you understand that to mean?

11 A Like you pointed out in the [REDACTED]

12 [REDACTED] [REDACTED]
13 [REDACTED] but I'm not sure if that's
14 what he's talking about here.

15 Q So this is January 20th, 2021. This is
16 before Qualcomm has completed the acquisition of
17 Nuvia; correct?

18 A That's right.

19 Q Nuvia had a core at that time that was
20 called [REDACTED] right?

21 A That's my understanding, yes.

22 Q Would it be logical to assume when he said
23 Nuvia core he meant the [REDACTED] core?

24 MR. BRALY: Objection; calls for speculation.

25 THE WITNESS: I think the confusion is coming

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1 from the word "core." There is a core as a CPU
2 core, and then there is a core as a core team. So
3 I'm not sure where he put the hyphen on that. It's
4 [REDACTED] I have no idea. That's
5 why I don't know what [REDACTED] he's talking about.

6 BY MR. MUINO:

7 Q I'm trying to get your understanding.
8 He's talking about a [REDACTED] and a team for
9 [REDACTED]. What is [REDACTED]?

10 MR. BRALY: Objection.

11 THE WITNESS: [REDACTED] team. I don't
12 know where he's putting the hyphen. Is it [REDACTED]
13 [REDACTED] team or [REDACTED] team.

14 BY MR. MUINO:

15 Q So we don't have to deal with those
16 complexities. Let's look at the next paragraph that
17 starts with "Unfortunately." If you look at the
18 second line, the last two words are "Nuvia cores."

19 Do you see that?

20 A Yes, I see it.

21 Q Did you understand what [REDACTED] meant?

22 A I don't know, but I think he would
23 probably mean [REDACTED], but, again,
24 it's something that Raghu can address better.

25 Q How can it mean [REDACTED] when

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1 Nuvia was not even acquired at this point in time?

2 MR. BRALY: Objection.

3 THE WITNESS: He's talking about, I believe --
4 again, I don't know what he means, but I think once
5 the acquisition happens. I honestly don't know.

6 [REDACTED] is the best one to answer.

7 BY MR. MUINO:

8 Q You were a recipient of this e-mail?

9 A Yeah.

10 Q Did you have an understanding of what
11 [REDACTED]?

12 A No.

13 Q This was just all Greek to you when you
14 read it?

15 MR. BRALY: Objection.

16 THE WITNESS: Like I said, I get hundreds of
17 e-mails in a day and I don't look at all of them.

18 BY MR. MUINO:

19 Q If somebody at the time referred to a
20 [REDACTED] what would you have understood that to
21 mean?

22 MR. BRALY: Objection; calls for speculation.

23 THE WITNESS: Again, you have to understand
24 [REDACTED]

25 and then there are things that were there at any

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1 given point in time. Many of these e-mails are
2 about [REDACTED], [REDACTED]. So I don't
3 know what he means here.

4 BY MR. MUINO:

5 Q You didn't understand that Nuvia had a
6 core at this time that was called the [REDACTED] core?
7 You weren't aware of that?

8 MR. BRALY: Objection; mischaracterizes
9 testimony.

10 THE WITNESS: I don't know what he means over
11 here. Like I said, I mean [REDACTED] is
12 how I would read it, but you would have to talk to
13 Raghu.

14 BY MR. MUINO:

15 Q Never mind his e-mail for a moment. Did
16 you understand [REDACTED]
17 [REDACTED] it was developing?

18 A Yes. We have talked about that.

19 Q You knew that; right?

20 A Yes.

21 Q They had a core that was called the
22 [REDACTED] core; right?

23 A Going into [REDACTED] yes.

24 Q That was part of what Qualcomm was
25 [REDACTED] [REDACTED]

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1 MR. BRALY: Objection.

2 THE WITNESS: It came with the core Nuvia team
3 for the CPU team which we were acquiring, yes.

4 BY MR. MUINO:

5 Q The [REDACTED] core was part of what Qualcomm
6 was acquiring; right?

7 A Uh-huh.

8 MR. BRALY: Objection.

9 BY MR. MUINO:

10 Q Is that a "yes"?

11 A Yes, it came with the whole team. We
12 acquired all the assets of Nuvia.

13 Q And Qualcomm was intending to continue to
14 work on the [REDACTED] core after acquisition; right?

15 MR. BRALY: Objection.

16 THE WITNESS: [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED].

24 BY MR. MUINO:

25 Q Let's look back at the two points of this

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1 e-mail. The first one says:

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 MR. BRALY: Objection; calls for speculation.

9 THE WITNESS: I don't know what he meant with
10 these two points.

11 BY MR. MUINO:

12 Q You have no idea?

13 MR. BRALY: Objection.

14 THE WITNESS: Again, [REDACTED] should be able to
15 explain this better.

16 BY MR. MUINO:

17 Q [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 MR. BRALY: Objection; calls for speculation.

23 THE WITNESS: I don't know.

24 BY MR. MUINO:

25 Q [REDACTED] Team, do

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1 you know what that refers to?

2 MR. BRALY: Objection; calls for speculation.

3 THE WITNESS: An engineering team. Probably
4 engineering is in a better position to address that.

5 [REDACTED]

6 [REDACTED] [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

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1 [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 A [REDACTED] [REDACTED]
9 Q [REDACTED]
10 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED] [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED] Y i [REDACTED]
25 [REDACTED]

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1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED]

9 MR. MUINO: I'm going to mark as Exhibit 16 a
10 document that has the Bates number AR_63625.

11 (Plaintiff's Exhibit 16 was marked
12 for identification by the deposition officer and is
13 attached hereto.)

14 BY MR. MUINO:

15 Q Mr. Asghar, do you recognize this as a
16 letter from you to Mr. Paul Williamson at Arm?

17 A Yes, I do.

18 Q And the letter is dated January 27, 2021;
19 correct?

20 A That's right.

21 Q The date of this letter is about two weeks
22 after Qualcomm had publicly announced the
23 acquisition of Nuvia in its press release; is that
24 right?

25 A Sounds about right, yes.

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1 Q In the first sentence of the letter you
2 say:
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]
9 (1 [REDACTED] 1) 1 P
10 [REDACTED]

11 A Yes.

12 Q [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED] [REDACTED] [REDACTED]
16 [REDACTED] [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1

[REDACTED]

2

[REDACTED]

3

[REDACTED]

4

[REDACTED]

5

[REDACTED]

6

[REDACTED]

7

[REDACTED]

8

[REDACTED]

9

[REDACTED]

10

[REDACTED]

11

[REDACTED]

BY MR. MUINO:

Q In the same paragraph, that first
paragraph, you say:

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

[REDACTED]

[REDACTED]

19

[REDACTED]

20

[REDACTED]

[REDACTED]

21

[REDACTED]

22

[REDACTED]

23

[REDACTED]

24

[REDACTED]

[REDACTED]

25

[REDACTED]

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1 Do you see that?

2 A Yes.

3 Q When did it come to Qualcomm's attention
4 that Qualcomm and Nuvia each had their own ALA and
5 TLA?

6 A I'm not aware of the exact date.

7 Q Qualcomm obviously knew that it had an ALA
8 and TLA with Arm; correct?

9 A Yes.

10 Q When did Qualcomm first figure out Nuvia
11 had those licenses with Arm?

12 MR. BRALY: Objection.

13 THE WITNESS: I don't know the exact time.

14 BY MR. MUINO:

15 Q When you say "It has come to our
16 attention," were you reflecting something that
17 someone had told you?

18 A This document was created in working with
19 our legal team and this is really the verbiage that
20 they had put in, so it's based on whatever the
21 assessment and acquisition process that was going
22 on.

23 MR. BRALY: I'll caution you not to reveal any
24 privileged communications with lawyers.

25 ///

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1 BY MR. MUINO:

2 Q Do you know when Qualcomm first reviewed
3 Nuvia's ALA?

4 MR. BRALY: Objection.

5 THE WITNESS: I don't.

6 BY MR. MUINO:

7 Q Do you know when Qualcomm first reviewed
8 Nuvia's TLA?

9 MR. BRALY: Objection.

10 THE WITNESS: I don't.

11 BY MR. MUINO:

12 Q Did Qualcomm have an understanding of the
13 rights and obligations of Nuvia under the Nuvia ALA
14 prior to the acquisition?

15 A Can you repeat your question?

16 Q Did Qualcomm have an understanding of the
17 rights and obligations of Nuvia under the Nuvia ALA
18 prior to the acquisition?

19 A I don't know.

20 Q [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 A Yes.
9 Q [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED] [REDACTED]
12 [REDACTED] [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED]

15 MR. BRALY: Objection.

16 [REDACTED] [REDACTED] [REDACTED]

17 BY MR. MUINO:

18 Q In the last paragraph of your letter you
19 say:

20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED]
22 [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 What you're referring to is in
2 the second paragraph where you say:
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 Do you see that?

13 A Yes.

14 Q [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED] [REDACTED] [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED] [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED]

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1	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]		
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]		
10	[REDACTED]		
11	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]	[REDACTED]
13	[REDACTED]		
14	[REDACTED]	[REDACTED]	
15	[REDACTED]	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	[REDACTED]
18	[REDACTED]	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]	[REDACTED]
21	[REDACTED]	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]	[REDACTED]
23	[REDACTED]	[REDACTED]	
24	[REDACTED]	[REDACTED]	[REDACTED]
25	[REDACTED]	[REDACTED]	[REDACTED]

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1	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]
10	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]
12	[REDACTED]	[REDACTED]
13	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]
15	[REDACTED]	[REDACTED]
16	[REDACTED]	[REDACTED]
17	[REDACTED]	
18	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]
20	[REDACTED]	[REDACTED]
21	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]
23	[REDACTED]	
24	[REDACTED]	[REDACTED]
25	[REDACTED]	[REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED]
5 [REDACTED] [REDACTED] [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED]

7 MR. MUINO: Why don't we take a break.

8 THE VIDEOGRAPHER: Off the record at 12:23 p.m.

9 (A recess was taken from 12:23 p.m.

10 to 12:28 p.m.)

11 THE VIDEOGRAPHER: On the record at 12:28 p.m.

12 MR. MUINO: All right. I'm going to mark as
13 Exhibit 17 a document with the Bates label
14 QCARM_7422237.

15 (Plaintiff's Exhibit 17 was marked
16 for identification by the deposition officer and is
17 attached hereto.)

18 BY MR. MUINO:

19 Q Mr. Asghar, do you see this is an e-mail
20 from Mr. Williamson at Arm to you dated May 18,
21 2021?

22 A Yes.

23 Q And the first sentence of Mr. Williamson's
24 e-mail says:

25 [REDACTED]

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6

A [REDACTED].

7

8

Q What is the Arm Connect system to your knowledge?

9

10

11

A I believe it's an online system to download information from Arm that we have access to.

12

13

14

Q To your knowledge, prior to the acquisition were the Nuvia employees using their own Nuvia credentials to access Arm Connect?

15

16

A I'm assuming so, but I don't know, of course.

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1	[REDACTED]	[REDACTED]	
2	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]		
5	[REDACTED]	[REDACTED]	
6	[REDACTED]	[REDACTED]	
7	[REDACTED]		
8	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	
10	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]	[REDACTED]	[REDACTED]
12	[REDACTED]		
13	[REDACTED]	[REDACTED]	[REDACTED]
14	[REDACTED]	[REDACTED]	
15	[REDACTED]		
16	[REDACTED]	[REDACTED]	[REDACTED]
17	[REDACTED]	[REDACTED]	
18	[REDACTED]	[REDACTED]	
19	[REDACTED]	[REDACTED]	
20	[REDACTED]	[REDACTED]	
21	[REDACTED]	[REDACTED]	[REDACTED]
22	[REDACTED]	[REDACTED]	
23	[REDACTED]	[REDACTED]	
24	[REDACTED]	[REDACTED]	
25	[REDACTED]	[REDACTED]	

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 MR. MUINO: I'm going to mark as Exhibit 18 a
25 document that has the Bates label 3450805.

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1 (Plaintiff's Exhibit 18 was marked for
2 identification by the deposition officer and is
3 attached hereto.)

4 MR. MUINO: I'm sorry, the text is so small.
5 Let's put this one aside. Let me see if I can get a
6 better copy.

7 THE WITNESS: Sure.

8 MR. MUINO: The next one has the same problem.
9 Okay, let's mark as Exhibit 19 a document that has
10 the label QCARM 27987.

11 (Plaintiff's Exhibit 19 was marked
12 for identification by the deposition officer and is
13 attached hereto.)

14 BY MR. MUINO:

15 Q Mr. Asghar, do you see this is a letter
16 from Paul Williamson to you dated February 2nd,
17 2021?

18 A Yes.

19 Q And you recognize this letter?

20 A Yes, I do.

21 Q The first sentence says:

22 "Thank you for your letter
23 dated January 27, 2021 regarding the
24 acquisition of Nuvia, Inc. ('NUVIA')
25 by Qualcomm Technologies, Inc.

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1 ('QTI')."

2 Do you see that?

3 A Yes.

4 Q You understood this was Mr. Williamson
5 responding to your earlier letter?

6 A Yes.

7 Q The second paragraph says:

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 Do you see that?

23 A I see that.

24 Q Now, by this point in time you understood
25 that Qualcomm and Nuvia each had agreements, license

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1 agreements with Arm; correct?

2 MR. BRALY: Objection.

3 THE WITNESS: I believe so based on the letter.

4 BY MR. MUINO:

5 Q You had previously said it had come to
6 your attention that each of Qualcomm and Nuvia had
7 their own ALA and their own TLA with Arm; correct?

8 A That's right.

9 Q And you understood that those agreements
10 had certain confidentiality obligations; correct?

11 MR. BRALY: Objection.

12 THE WITNESS: We basically looked at it as
13 Qualcomm ALA being the umbrella document there, and
14 from that perspective we were operating under that
15 understanding.

16 BY MR. MUINO:

17 Q You understood at this point that the
18 Nuvia license agreements had their own
19 confidentiality obligations in them; correct?

20 MR. BRALY: Objection; calls for a legal
21 conclusion.

22 THE WITNESS: I was not aware of the
23 confidentiality agreement obligations.

24 BY MR. MUINO:

25 Q Had you looked at the Nuvia ALA and TLA at

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1 this point in time?

2 A I had looked again more at the financial
3 part of it rather than the complete details of it,
4 so, yeah, working with the legal team.

5 Q Had you looked at the [REDACTED]

6 [REDACTED] in the Nuvia ALA and TLA?

7 A No.

8 Q [REDACTED]

9 [REDACTED]; [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED] [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED] [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]; [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED]

25 [REDACTED] [REDACTED]

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1 BY MR. MUINO:

2 Q Did Qualcomm take any steps as of this
3 point in February 2021 to ensure that [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 MR. BRALY: Objection.

8 THE WITNESS: I don't know.

9 BY MR. MUINO:

10 Q [REDACTED]
11 [REDACTED] + [REDACTED]
12 [REDACTED]

13 MR. BRALY: Objection.

14 THE WITNESS: We had our own Qualcomm ALA, so
15 at least from my product perspective we didn't have
16 any such concern.

17 BY MR. MUINO:

18 Q That wasn't my question. [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 MR. BRALY: Objection.

22 THE WITNESS: No, and I wasn't aware of the
23 need for that either.

24 BY MR. MUINO:

25 Q Were you aware that Nuvia couldn't

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MR. MUINO: I'd like to mark as Exhibit 20 a document that begins with the Bates number QCARM_339647.

17

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19

(Plaintiff's Exhibit 20 was marked for identification by the deposition officer and is attached hereto.)

20

BY MR. MUINO:

21

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23

Q Mr. Asghar, do you recognize this as a letter from you to Mr. Williamson at Arm dated February 3rd, 2021?

24

A Yes.

25

Q This is one day after the previous letter

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1 we looked at between the two of you; is that
2 correct?

3 A Yes.

4 Q And I'd like to go to the fourth
5 paragraph of this letter and you say:

6 "Both Nuvia and Qualcomm's
7 existing agreements with Arm provide
8 for [REDACTED]
9 [REDACTED] [REDACTED]

10 [REDACTED]
11 [REDACTED]
12 [REDACTED] "

13 Do you see that?

14 A I do.

15 Q By this point in time, February 3rd, 2021,
16 you were aware that both the Nuvia and Qualcomm
17 agreements with Arm had [REDACTED]

18 [REDACTED] correct?

19 MR. BRALY: Objection.

20 THE WITNESS: I was not aware of the particular
21 details like I mentioned earlier.

22 BY MR. MUINO:

23 Q You were aware enough to be able to write
24 this in your letter; right?

25 A Yes. This was drafted in consultation

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1 with our legal team.

2 Q You go on to say:

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 A [REDACTED]

8 Q [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 MR. MUINO: I'm going to mark as Exhibit 21 a
24 document that starts with the Bates number
25 Arm_1281876.

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1 (Plaintiff's Exhibit 21 was marked
2 for identification by the deposition officer and is
3 attached hereto.)

4 BY MR. MUINO:

5 Q Mr. Asghar, you see this is a letter from
6 you to Mr. Williamson dated February 25th, 2021?

7 A That's right.

8 Q And you recognize this letter?

9 A Yes.

10 Q Let's start with the first paragraph.
11 It's about the middle of the paragraph where
12 there's a line that says [REDACTED] [REDACTED]
13 [REDACTED]

14 Do you see that line?

15 A Yes.

16 Q The sentence in full says:

17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]

25 Do you see that?

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1 A Yes, I see it.

2 Q What was the basis for that statement?

3 A [REDACTED] [REDACTED]

4 [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 [REDACTED] [REDACTED]

24 [REDACTED] [REDACTED] [REDACTED]

25 [REDACTED] [REDACTED]

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1 Q [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED] [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED] [REDACTED]
9 [REDACTED] [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
14 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED]
20 [REDACTED] [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
24 [REDACTED]
25 [REDACTED] [REDACTED]